

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW MEXICO**

HUMAN RIGHTS DEFENSE CENTER,

Plaintiff,

vs.

No. 1:24-cv-01091-JMR-KRS

MICHELLE LUJAN GRISHAM,  
individually and in her capacity as Governor  
of the State of New Mexico; ALISHA  
TAFOYA LUCERO, individually and in  
her capacity as Cabinet Secretary of the  
New Mexico Corrections Department;  
MELANIE MARTINEZ, individually and  
in her capacity as Deputy Secretary of the  
New Mexico Corrections Department;  
GARY MACIEL, individually and in his  
capacity as Deputy Secretary of the  
New Mexico Corrections Department;  
BRIAN R. EVANS, individually and in  
his capacity as Chief Executive Officer of  
The GEO Group, Inc.; WAYNE H. CALABRESE,  
individually and in his capacity as President and  
Chief Operating Officer of The GEO Group, Inc.;  
THE GEO GROUP, INC. d/b/a LEA COUNTY  
CORRECTIONAL FACILITY, a corporation;  
JOHN AND JANE DOES 1-20, individually and  
in their official capacities; and ENTITIES 1-10,

Defendants.

**AFFIDAVIT OF WAYNE CALABRESE**

I, Wayne Calabrese, state the following from personal knowledge and under penalty of perjury.

1. I am the President and Chief Operating Officer of The GEO Group, Inc. ("GEO").
2. GEO is a for-profit corporation organized under the laws of the State of Florida with its principal place of business in the State of Florida.

3. GEO provides diversified correctional and community reentry services for governmental entities across the country and around the world.

4. I reside in the State of Florida.

5. I do not live in the State of New Mexico and have no plans to relocate to the State of New Mexico.

6. I do not work in the State of New Mexico.

7. I do not own any property in the State of New Mexico.

8. I do not own any businesses organized under the laws of the State of New Mexico.

9. I do not regularly travel to the State of New Mexico.

10. I am aware that GEO provides management services at one adult correctional facility in the State of New Mexico, the Lea County Correctional Facility (“LCCF”), and that GEO is contractually obligated to apply the policies and procedures of the New Mexico Corrections Department at LCCF.

11. I had no role and have never had any role in drafting, creating, approving, implementing, applying or supervising the application of any NMCD policies or procedures, including the NMCD policies and procedures respecting inmate mail and correspondence referenced in the Complaint.

12. I had no role and have never had any role in screening or handling any mail at LCCF and have never directly or indirectly communicated with or otherwise supervised or directed LCCF personnel in their screening and handling of mail at LCCF pursuant to NMCD policies and procedures. Thus, I had no role in any aspects of the handling of the thirteen (13) publications that the Complaint alleges were improperly rejected at LCCF.

  
WAYNE CALABRESE

STATE OF FLORIDA )  
 ) ss.  
COUNTY OF Palm Beach )

SUBSCRIBED AND SWORN to before me this 7 day of January 2025.

Shane V. Venero  
Notary Public

My Commission Expires:

11 | 2 | 25



**GRACE V. VENIERO**  
Commission # HH 174768  
Expires November 2, 2025  
Bonded Thru Budget Notary Services